

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH  
CAROLINA WESTERN DIVISION

No. 5:21-CV-00225-BO

JUDITH KNECHTGES,

Plaintiff,

v.

NC DEPARTMENT OF PUBLIC  
SAFETY, et al.,

Defendants.

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**DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

NOW COMES Defendants, NC Department of Public Safety, Eric Hooks, Janet Thomas and Terri Catlett ("Defendants") appearing by and through undersigned counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and moves for summary judgment in their favor on the grounds that there is no genuine issue as to any material fact and Defendants are entitled to judgment as a matter of law.

In support of this Motion, Defendants rely upon its memoranda of law, the pleadings, exhibits, declarations and the statement of material facts filed contemporaneously with this Motion, and the Memorandum in Support of this Motion.

WHEREFORE, based upon the above and the arguments and authorities set forth in Defendants' Memorandum of Law, Defendants respectfully request that this Court allow this Motion for Summary Judgment, and dismiss all claims against them.

This the 17<sup>th</sup> day of May 2023.

JOSHUA H. STEIN  
ATTORNEY GENERAL

/s/ Bryan G. Nichols  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, I electronically filed the foregoing **Motion for Summary Judgment** with the Clerk of the Court utilizing the CM/ECF system which will provide electronic notification to Plaintiff's counsel of record as follows:

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This the 17<sup>th</sup> day of May, 2023.

/s/ Bryan G. Nichols  
Bryan G. Nichols  
Assistant Attorney General